



April 13, 2023

By ECF and Email

Hon. Cathy Seibel, U.S.D.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

**Re: *International Business Machines Corporation v. Patama Chantaruck*
Case No. 23-cv-1191-CS**

Dear Judge Seibel:

We write on behalf of defendant Patama Chantaruck to respectfully request that her time to answer or otherwise respond to the Complaint be extended from April 19, 2023 through May 3, 2023 to allow the parties time to continue discussing a possible resolution. This is Ms. Chantaruck's second request for an extension and Plaintiff consents to the proposed extension. Ms. Chantaruck reserves all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action.

We thank Your Honor for your consideration.

Respectfully submitted,

/s/ Kim L. Michael
Kim L. Michael

cc: All counsel of record by ECF